## **Executive Summary**

The Massachusetts Division of Energy Resources ("DOER") would like to take this opportunity to thank Chairman James Connelly and the rest of the Massachusetts Department of Telecommunications and Energy ("Department") for this opportunity to provide written comments on how the retail competition in Massachusetts' electric industry can be advanced. The following is a summary of our comments, which are divided between short-term recommendations that may prove beneficial immediately and other recommendations that will have a longer-term impact.

## **Short Term**

- DOER asks that the Department expeditiously approve retail pilot programs
   (particularly that of the Massachusetts Electric Company) with the modifications recommended herein.
- DOER recommends that the Department direct the electric distribution companies to
  procure Default Service on a twelve-month basis and provide 12 months of proices to
  customers for each Default Service period.
- DOER recommends certain changes to the Department's Website that will ease the present frustration that customers are encountering in finding active competitive suppliers.
- DOER would not object if the Department found reason to determine that there was
  reason to change the current name for Default Service because many customers
  believe that the present term is prejorative.

## Long Term

- DOER recommends that the Department consider investigating the benefits of approving Default solicitations and prices that are longer than 12 months.
- DOER requests the Department reconsider it earlier decisions not to include certain real costs incurred by the electric distribution companies to provide Default Service.
- DOER believes that installation of "Time of Use" meters for all customers is a critical component in developing a retail competitive market and make certain recommendations concerning how this should be accomplished.
- DOER recommends that the Department current rules on partial payment be revised to allow an equitable sharing between the electric distribution companies and competitive suppliers.
- DOER recommends that rules allowing a single bill supplier option be made available to customers, at least on a pilot basis.
- DOER requests the Department investigate ways to remove regulatory barriers to the development of on-site generation.